

EXHIBIT B

1 Q. So 2012 to 2013 roughly?

2 A. Around there.

3 Q. Were you in Honolulu or --

4 A. I was the big island.

5 Q. Okay.

6 A. -- or the main island. Which one is it?

7 The main island? Is that the one with all the
8 craziness going on there?

9 Q. It's been a long time since I've been in
10 Hawaii so I'm not sure.

11 A. Yeah. I just kind of go somewhere -- but
12 it's records, I can get them.

13 Q. And then prior to 2012, you lived in San
14 Diego. When did you first arrive in San Diego?

15 A. I was there quite a bit. So I was in BUD/S
16 for three times so the story gets long and drawn out
17 now. So I went to San Diego the first time in 2000 to
18 go through my first Navy SEAL training. And then I
19 got injured, went back to Indiana for a second, went
20 back 2001, so pretty much from I would say from 2000
21 all the way until 2012, around there.

22 Q. You were living in San Diego --

23 A. Yeah.

24 Q. -- roughly all the time?

25 A. Roughly, roughly.

1 Q. Okay.

2 A. But about 12 years hardcore, you know.

3 Q. Sure.

4 A. Going through BUD/S, you know, it goes back
5 and forth, you know.

6 Q. And when was it -- I assume it was in San
7 Diego that you first met Paul Castro?

8 A. Uh-huh, yes, yes.

9 Q. Okay.

10 A. I met Paul Castro in San Diego.

11 Q. Okay. How is it that you came to meet Paul
12 Castro?

13 A. Well, Paul Castro I believe was a
14 reservist -- was an officer. I don't know if he was a
15 reservist or not so I can't really speak about Paul.
16 But I was working in the PA -- I was pretty much the
17 head you of, you know, the SEAL teams. I was the
18 poster child. They had no black people in the SEAL
19 teams. I was like around the 36th African-American to
20 become one in 70 years.

21 So they're looking for more
22 African-Americans to become SEALs. Since, you know, I
23 was the guy already out there doing these long races
24 and I already had a lot of publicity, I was pretty
25 much a public figure before I went there so they hired

1 me to be a recruiter.

2 Q. Okay.

3 A. So I was a recruiter and I believe Paul was
4 a PAO, Public Affairs Officer.

5 Q. So you were in the Navy by the time that you
6 first met Paul?

7 A. Yes.

8 Q. Okay.

9 A. And so was he.

10 Q. Prior to the Navy, had you served in the Air
11 Force?

12 A. I did.

13 Q. When did you serve in the Air Force?

14 A. From '94ish to '98. But then I went to the
15 reserves in the Air Force until almost '99 because at
16 that -- I'd have to look on my documents because then
17 I bleed over to the Navy. So I'm in the Air Force and
18 I kind of get out of the Air Force. I worked for a
19 job, Ecolab, spraying for cockroaches, and it bleeds
20 into the Navy. All that period of time right there is
21 kind of just like of bled in so.

22 Q. Okay. Other than the Air Force and the
23 Navy, have you served in any other armed forces?

24 A. I didn't serve, but I actually went through
25 Army Ranger School. So I was the honor man -- I was

1 the enlisted honor man at Army Ranger School, class
2 0304. As a matter of fact, I'm the only person in the
3 history of the military who did Air Force, TACP, Army
4 ranger and also the Navy SEALs.

5 Q. Okay.

6 A. So remember get that all there. That's
7 important.

8 (A conference was held off the record.)

9 Q. During what period of time were you at Army
10 Ranger School?

11 A. I went to ranger school -- I was a winter
12 ranger so I was there '03, '04 so I went in 2003,
13 December, and I graduated 2004. So I was there three
14 months. In February I graduated, February 2004.
15 Winter ranger means that -- I was a Christmas ranger
16 so you go to the first phase -- ranger school was
17 three months or phases. The first phase is in
18 Georgia, then you have like a little break in between
19 because I was a Christmas ranger. So you go off for
20 like two weeks and get all fat and happy and then come
21 back and do your phase two and three.

22 Q. But you have never actually -- other than
23 ranger school, you never actually served in the Army?

24 A. I didn't serve in the Army, but actually as
25 an Air Force TACP, what happens is you are liaison to

1 the Army. So I was stationed at Fort Campbell,
2 Kentucky.

3 Q. Okay.

4 A. And Fort Campbell Kentucky is an Army base.
5 I was stationed there for three and a half years.
6 Where I worked -- I was there, I was with an Army unit
7 for three and a half years so I was -- I wore an Air
8 Force uniform, but I was in the Army.

9 Q. Okay.

10 A. That's what they call us.

11 Q. Okay. When did you first have any
12 discussion with Paul Castro about doing a movie or
13 book or anything of that sort about your life?

14 A. I believe it was 2008. And I'm sorry, I'm
15 going to keep this slow. It was 2008 when he came to
16 the PAO office. And my job in the SEAL teams at the
17 time was, like I said, I was the -- I was the face of
18 the SEAL teams and they had me farmed out. I traveled
19 200-some-odd days a year just telling my life story.
20 So I became a humongous public figure as far as like,
21 you know, my story was out there left and right.

22 And that's how Paul Castro heard my story.
23 He got sent over to the PAO office to help out because
24 we really were charging forward to get more people to
25 become Navy Seals, especially African-Americans. He

1 heard my story and he became intrigued with who I am
2 as a person.

3 Q. So in 2008, how do you recall the first
4 discussion of doing a movie or a book about your life
5 developing? Did Paul raise the subject? Did you
6 raise it?

7 A. I didn't even know who Paul Castro was.

8 Q. Okay.

9 A. I didn't know he did movies I knew nothing
10 about Paul Castro. So he obviously raised it to me
11 because I don't go around saying, hey, do you do
12 movies, do you do movies, do you do movies. So I
13 didn't know who he was. So basically Paul Castro came
14 to me, heard my story, gave me his complete resume
15 about who he was.

16 Q. Okay. Had you heard of for example the
17 movie August Rush?

18 A. I never heard of it until he brought up what
19 it was.

20 Q. Have you since seen that movie?

21 A. Paul Castro wanted me to see it. I saw it.
22 Let me look back. He wanted me to see the movie, I
23 saw it then. But, you know, I'm a Navy SEAL retired
24 guy, I ain't watching no guy that plays instruments
25 and stuff like that.

1 **it says exactly what it says, if it was my life story.**

2 Q. Okay. But you did agree that Paul Castro
3 had the right -- you were giving him the right to
4 write your life story?

5 MR. SPENGLER: Objection.

6 A. If we want to move forward on this, we can,
7 but I'm going to continue giving you the same answer
8 you're giving me. I understand what you're saying. I
9 want you to understand that I'm saying. I'll stay
10 here all day long.

11 Q. Okay.

12 A. I've already spent \$70,000 on this stupid
13 case. I'll stay here all day long.

14 Q. How much, 70- or 17-?

15 A. 70-, 70-.

16 Q. Okay.

17 A. Roughly. I want to make sure that's clear.
18 Roughly \$70,000.

19 Q. After Exhibit 1, was there further
20 discussion that you had with Paul Castro about
21 memorializing the agreement that the two of you had
22 regarding writing the movie?

23 MR. SPENGLER: Objection. Object to form.

24 Q. Go ahead.

25 MR. SPENGLER: Go ahead.

1 these people have to know my true story because this
2 is not it, this is not it. So I wanted to hear these
3 experts hear my life story.

4 And we present this to them and Paul
5 explains to them how he got this. Okay. That's what
6 we agreed on. We walk into this Overbrook meeting,
7 I'm sitting there, it's two males and a female. And
8 as a matter of fact, her name is Tracey Nyberg, Tracey
9 Nyberg. I got to remember her real quick.

10 So I'm sitting there and Paul just is in a
11 cold sweat, he's so excited. Because why? As a
12 screenwriter, you're in front of Overbrook now, man.
13 This is big time for Paul Castro. So he's sitting
14 there, man, and he's selling this script, this script
15 that's 70 percent not my life. He's selling this
16 thing like it's my life story. And I'm sitting there
17 and I said probably five words.

18 And the only reason why I didn't embarrass
19 Paul Castro in that meeting was because it's the man
20 that I am. I knew if I were to tell him in that
21 meeting that what you're saying and you're selling as
22 my life is not my life, that I would -- because that
23 was his job. He was a screenwriter. So I didn't want
24 to embarrass him in front of these people.

25 So anyway, we leave that meeting, I'm in

1 this car, I'm pissed off because my life means
2 something to me and he lied about my life. Okay. So
3 then I'm sitting there driving. We go off, I don't
4 talk to him. I go back to the hotel room and I'm
5 like, do you know what, this -- I got to find these
6 people, call them up and tell them my real life story.

7 So I call up Tracey Nyberg I think a day or
8 two later, I forget exactly, but there's an e-mail
9 that discusses that. And I say, Tracey, in that
10 meeting, Paul Castro sold that script as my life, it's
11 not my life. So for 45 minutes I told Tracey Nyberg
12 my true story. Never heard from her again. And also
13 I wrote Paul Castro an e-mail about what I did and
14 what went on.

15 And bottom line is that was when -- and I
16 think Paul Castro returned it, whatever, no big deal.
17 The bottom line is I told you what I did. Phase one
18 ended right there. So when he went into that meeting
19 and did not give my life story like we agreed to, my
20 word then was now gone because he did not do what he
21 said he was going to do.

22 Q. When was that meeting with Overbrook, do you
23 recall roughly?

24 A. I don't remember the exact date of that
25 meeting. I can go through the e-mails and see when

1 I --

2 Q. Do you remember which --

3 A. -- e-mailed Paul.

4 Q. Do you remember the month?

5 A. I don't.

6 Q. Okay.

7 A. But the e-mails have it.

8 Q. Before the meeting with Overbrook, had you
9 read a copy of the script?

10 A. For sure, yes, I did.

11 Q. And had you complained to Paul Castro about
12 the script in terms of -- and told him that you didn't
13 think it accurately conveyed events in your life?

14 A. No. Like I said, Paul Castro sold me on the
15 fact -- once again Paul Castro sold me on the fact
16 that these screenplays had to have a bunch of
17 make-believe fairytale in it.

18 Q. Okay.

19 A. So but what I do know for 100-percent fact
20 is that we discussed that when we walk into this
21 meeting, we will tell these people the true story of
22 my life so they understand it in its entirety.

23 Q. Prior to the meeting at Overbrook, had you
24 ever expressed concern to Paul Castro that the script
25 that you reviewed did not accurately convey events in

1 **THE WITNESS: Roger that.**

2 (A recess was taken.)

3 Q. So as of the meeting with Overbrook,
4 Mr. Goggins, what outstanding issues with the script
5 existed that you wanted changed?

6 A. There was a lot of things I wanted changed.

7 Q. Okay. Specifically what were they?

8 A. For instance, the last race, the last race.
9 And like I said, I agreed to the script so these
10 changes that weren't made bothered me, but I went with
11 it because he was the expert. So the whole last race
12 never happened. The whole thing about Spencer Calvin
13 running with me in the last race, the BUD/S
14 instructor, he was never an ultrarunner.

15 The whole last race, the 205-mile race that
16 I did, I did around a one-mile track. I never did it
17 in the desert. I wanted that changed. I never -- the
18 whole last scene of that movie, the whole last scene
19 never happened about me fireman's carrying some guy to
20 the finish line. I never said anything about that in
21 my entire life.

22 Q. But as of the meeting with Overbrook, you
23 weren't insisting on additional changes, were you?

24 A. I wasn't insisting on additional changes,
25 but I was insisting on him knowing my life story.

1 fact, but, I mean, at the end of the day, you agreed
2 that the project could go forward with the script as
3 written?

4 A. At the end of the day, I trusted him that
5 when we went to these people, we would tell them my
6 true life. So yes, I agreed on the script, but I
7 trusted him that in this meeting, which is why both
8 meetings didn't work, because he didn't live up to his
9 end of the bargain, which was telling the true story.

10 Q. And you responded to his e-mail and said,
11 "Love you my friend." Right?

12 A. Yeah, oh, yeah. Once again, you're going to
13 see a bunch of great e-mails. But after -- I want to
14 see the e-mails after the meeting. That's what I want
15 to see.

16 Q. Well, so, I mean, I'm trying to understand.
17 You were fine with the script as written, but you felt
18 like there should be some explanation to the people at
19 that meeting about the script?

20 A. Yes. So this is what I believe, this is how
21 I believed it, okay, that he sold me on the fact that
22 we had to do all of this Hollywood stuff, which I
23 never liked. But once again, I mean, you trust
24 someone and he had and the experience. He is the
25 writer, I am not. I know nothing about the business.

1 Q. So who do you know of -- as we sit here
2 today, who do you know of, who was at the dinner
3 meeting but wasn't at The Gersh Agency meeting?

4 A. Like I said, only people I remember at the
5 dinner that I can tell you is Boris Kodjoe, myself,
6 Paul Castro, my mom and Scott Gearen.

7 Q. Was Boris Kodjoe at The Gersh --

8 A. Yes, he was.

9 Q. Scott Gearen, was he at The Gersh Agency
10 meeting?

11 A. Yes, he was.

12 Q. Your mom was at The Gersh Agency meeting?

13 A. Yes, she was.

14 Q. Do you remember Lauren Selig being present
15 at either of those two meetings?

16 A. I know that Lauren was not at The Gersh
17 company meeting because I remember Gersh talking to
18 Paul and they were kind of lighting Lauren's butt up
19 about what she's not and what's she this so obviously
20 she's wasn't there. I'm not for sure about the dinner
21 though. I can't remember.

22 Q. Do you know whether Billy Badalato was at
23 either of those meetings?

24 A. I wouldn't known Billy Badalato. I've never
25 met him.

1 Q. Do you remember meeting Lauren Selig?

2 A. I know Paul talked about her a lot and I
3 think I may have met her quickly at the speaking gig.
4 I don't know if she had dinner or not, but I'm not
5 really for sure. I know she talked about -- I know of
6 her.

7 Q. At some time prior to the dinner, did Paul
8 Castro ask you to write a legal document just
9 indicating that he had the rights to write the
10 screenplay?

11 MR. SPENGLER: Object to form, calls for a
12 legal conclusion.

13 A. He asked me -- well, he actually -- it was a
14 letter. He said that to have this meeting, David --
15 he was real frantic about it. He kept talking and
16 talking, talking, talking about this letter, that he
17 needed this letter, needed before this meeting to show
18 people that we were trying to work together on
19 something. So I know at this time he was trying -- so
20 he actually drafted some letter up and sent it over
21 and my mom kind of did the rest.

22 Q. Okay. You knew, from prior communications
23 with Paul, that he needed to show some kind of
24 documentation to the third parties he was working with
25 to show that he in fact had the rights to do this.

1 At some point though, the letter that Paul requested
2 was sent, was it not?

3 A. It was.

4 Q. Okay. Tell me how that came about.

5 A. Oh, man. It came about I was upstairs
6 working. Like I say, I was going to go be wildlands
7 firefighter in a few months so I was kind of getting
8 packed up, getting ready to go. And I was also
9 getting ready to go to California. And my mom got
10 this e-mail and the e-mails says exactly what it says.
11 She says, hey, I got this e-mail from Paul.

12 It was sent to my e-mail, my mom checked it
13 out and I was upstairs doing work. And Paul had sent
14 me so many e-mails this day wanting this e-mail back,
15 that I was too busy and I was like, hey, look at it,
16 if it doesn't sound stupid, because I'm not getting
17 into a legal agreement with Paul right now, I'm going
18 to wait until after this -- until after this doggone
19 thing. And he kept talking this stuff. I want to see
20 how he performs in this meeting that he performed so
21 horribly in the first time, which I'm going to have
22 people there with me. And she wrote this.

23 Q. Okay. First of all, does your mother
24 typically check your e-mail?

25 A. All the time --

1 Q. Okay.

2 A. -- if I'm not around or ask her to.

3 Q. And she testified that she responded and
4 sent this e-mail with your authority. Is that true?

5 A. If I told my mom to check something, I don't
6 believe if it was my -- yeah, which I'm sure it was.
7 She doesn't lie.

8 Q. She wasn't sending an e-mail without your
9 permission?

10 A. Yeah, she doesn't lie at all.

11 Q. She had your permission to send the e-mail
12 that she sent, did she not?

13 A. I'm not going to say she had my permission.
14 If it was my mother and she said that's what it was,
15 that's what it was.

16 Q. Well, now, I want to know, did she have your
17 permission? I mean, you told her to send the e-mail
18 that Paul was requesting, did you not?

19 A. What I said was look at the e-mail, read it
20 over and then you use your best judgment on the
21 e-mail.

22 Q. And you authorized her to send the e-mail --

23 A. Obviously --

24 Q. -- to Paul?

25 A. -- if that's what I said.

1 Q. Yes, at that point in time?

2 A. At that point in time.

3 Q. The answer is yes at that --

4 A. No.

5 Q. -- point in time he did?

6 A. At that point in time, yes.

7 Q. Okay. And that only changed you said at the
8 meeting with The Gersh Agency?

9 A. Right.

10 Q. I want to talk about that meeting some more.

11 A. Good.

12 Q. Do you know why your mother edited the
13 letter that Paul Castro asked for?

14 A. I have no idea why she edited it. Maybe
15 because she didn't like how it read. I don't know.

16 Q. I'm sorry. I don't understand what that
17 means.

18 A. If she -- if she edited it, she probably
19 didn't like how the letter was reading.

20 Q. I see. I see. I mean, you understand that
21 Exhibit 17 is different than the language contained in
22 Exhibit 16 in several respects?

23 A. Oh, yeah, I see that.

24 Q. Okay. Have you ever had any discussion with
25 her about her decision to change the draft at any

1 A. Like I say, there's a couple people in that
2 meeting and once again, in all honestly, under oath, I
3 do not remember the people. I remember that one scene
4 because that's the one scene that really stuck in my
5 head about my saving someone's life. Because why? In
6 the military, I work with guys who save people's lives
7 and I haven't.

8 That one scene sticks out to me so much by
9 being a 21-year veteran of the military, that it just
10 was so -- and for somebody to say -- call me a hero
11 and call me great, I'm not that so that -- that's one
12 thing that stuck out to me.

13 Q. But you knew about that scene going into the
14 meeting at The Gersh Agency and you approved it.
15 Right?

16 A. Do you know what, I approved it be the fact
17 that we were going here -- trust me, in my eyes, in my
18 eyes, 100 percent under oath, that was not going to go
19 down. That's why it's not going down. So look, check
20 this out, is there a movie made right now? If I
21 really agreed to everything in that script, if I
22 agreed to everything in that script both times, every
23 time, 26 times, whatever, it would have went down.

24 Q. Not when you --

25 A. Once again --

1 Diego at that time?

2 **A. Yes, she was.**

3 Q. And then after the two of you separated, did
4 she move to Illinois?

5 **A. Indiana.**

6 Q. Indiana? To Brazil?

7 **A. Yes, Brazil.**

8 Q. Do you know how long she stayed in Brazil?

9 **A. She's still there.**

10 Q. When's the last time you've spoken with your
11 daughter Jade?

12 **A. It was -- she reached out to me maybe six
13 months ago about a workout or something like that.**

14 Q. And prior to that, when had been the last
15 time you'd spoken to her?

16 **A. We don't speak too much.**

17 Q. Over say the last five years, how many times
18 have you spoken to her?

19 **A. Man, over 5 years, I would say 10, 12 tops.**

20 Q. There was, as you know, an action brought in
21 Libertyville for child support by the state on behalf
22 of Ms. Pritchard. What do you know about that?

23 **A. That caught me way off guard because I never
24 missed a child support and I have all the records to
25 prove that, never missed one in my entire life. So**

1 what it was -- I actually didn't find out about it
2 until I went to get a passport. So I go to get a
3 passport and they deny me the passport. And I was
4 like what's going on here and they said, well, you --
5 Illinois says this and -- so I'm not for sure what
6 really happened.

7 But I was retired from the military, Lee
8 wanted more money for child support I believe or she
9 was maybe scared that I was going to stop direct
10 deposit. I'm not for sure. And they had never
11 garnished my wages so like the military usually
12 garnishes your wages. I had direct deposit set up
13 from the beginning of time with her so I don't know if
14 she got worried. I don't know. I can't speak for
15 her.

16 So something happened through Illinois that,
17 and Illinois was doing something with my wages. They
18 said we're going to start garnishing your wages. I
19 was like okay. I really can't speak intelligently
20 about this because I don't even know what happened.
21 When I got out of the military, I started paying her
22 with checks. Bottom line is I don't know.

23 I then called Indiana, you know, when I
24 didn't have my passport. Indiana called Illinois. I
25 guess they weren't talking to each other. Because I

1 retired from the military, it -- honestly it baffled
2 me too. It baffled me too. And I have every single
3 document on paying for it.

4 As a matter of fact, for the first year, I
5 was supposed to pay \$500 a month or -- \$500 a month.
6 For the first year, we were divorced I paid \$900 a
7 month and I was only ordered to pay 500. I also paid
8 \$13,000 for her schooling and I also paid for her car
9 so.

10 Q. Well, when you indicated in 2015, that
11 you -- as a result of speaking engagements, that was
12 your best year ever and you made \$95,000 off of 19
13 gigs. Is that right?

14 A. Uh-huh.

15 Q. Correct?

16 A. Yes.

17 Q. Was child support modified in any way to
18 reflect the fact that you now made an additional
19 \$95,000?

20 A. It wasn't modified because whatever they ask
21 for, they get. I've only turned my daughter down once
22 for anything. Because my salary would go from -- so
23 that's the highest it was. It was a standard like
24 \$60-something-thousand, military guy. So, you know,
25 it fluctuated. But I never turned down them for

1 **anything.**

2 Q. Have the payments been \$500 a month; that
3 is, the court-ordered payments been \$500 a month as
4 long as you can remember?

5 A. Yeah, as long as I can remember. I also
6 have a check here for \$900-something that I just gave
7 this week. Whatever they need, I pay.

8 Q. But there was never any increase in the
9 monthly amount by virtue of the income that you made
10 outside of the military. Correct?

11 A. No, no. She never brought me to court for
12 that or never --

13 Q. Do you know if she was even aware of how
14 much money you were making outside the military?

15 A. I have no idea if she's aware. I mean, she
16 can definitely ask or definitely do what she's doing
17 now where she's trying to get more money. That's up
18 to her so, you know.

19 Q. When you say she's trying to get more money,
20 what do you mean?

21 A. Like she wants more child support.

22 Q. And when is the last time you've had any
23 communication with her about that subject?

24 A. I don't communicate with her so we have
25 lawyers that do all that stuff.

1 Q. There are attorneys. Do you know who her
2 attorney is?

3 A. I have no idea what her name is.

4 Q. Is her attorney in Libertyville?

5 A. Once again, Libertyville is Illinois. She's
6 in Indiana.

7 Q. Her attorney's in Brazil, Indiana?

8 A. Right. I'm not sure if it's in Brazil or
9 Terre Haute. I'm not for sure.

10 Q. Do you know if there was any pending action
11 in Indiana to try to get more child support?

12 A. There should be pending action to get more
13 child support, but there's not pending action that I
14 haven't paid child support because I've never missed a
15 payment.

16 Q. But you understand that the amount that
17 you're supposed to pay is based upon your income.
18 Right?

19 A. Do you understand that the amount you're
20 supposed to pay is according to the document and if
21 you want more money, you take me to court and you get
22 more money? That's how I understand it.

23 Q. Is --

24 A. I understand if a lawyer and judge says you
25 owe \$500 a month and this person is not taking you to

1 court -- which she is now after 15 years and now she
2 may or may not. She actually might get less money
3 now. Who knows.

4 Q. So in 2015, between your military income and
5 your speaking engagements --

6 A. Uh-huh.

7 Q. -- what was your total income that year
8 before taxes?

9 A. I think I told you I think it was like
10 one -- whatever I said. I'm not for sure. I have to
11 look at my taxes.

12 Q. You said --

13 A. But let me ask you one question though.

14 Q. You --

15 A. Go ahead. I'm sorry.

16 Q. You said you made \$95,000 off of just that
17 one Patriot Tour?

18 A. Yeah.

19 Q. And that's the one, but that's 19 gigs and
20 then you had military salary?

21 A. Yup.

22 Q. You had disability for part of 2015?

23 A. I was in the military.

24 Q. You were in the military so that didn't hit
25 until 2016?

1 A. Yup. Can't get --

2 Q. What was your military salary in 2015?

3 A. For me to give you a good answer on that, I
4 need to look at my tax paperwork, but I think it was
5 about \$60,000-something.

6 Q. So between speaking gigs and your military
7 income, is it fair to say that you made at least 160
8 grand in 2015?

9 A. I don't think it's 160-. I'm not for sure.

10 Q. You're not --

11 A. I mean, yeah. You can say what you want,
12 that's fine.

13 Q. It would be 95,0000 for the Patriot Tour?

14 A. Uh-huh.

15 Q. You had another speaking event?

16 A. Uh-huh.

17 Q. Correct? But you don't know how much you
18 made for that?

19 A. No.

20 Q. And then it was the military?

21 A. Uh-huh.

22 Q. So that takes you up to about 160,000,
23 doesn't it?

24 A. That's fine. I mean, it could be 400,000,
25 you know, whatever.

1 Q. And you paid 500 a month in child support?

2 A. Along with medical and dental and along with
3 whatever else they needed.

4 Q. Was Jade on your medical policy through the
5 Navy?

6 A. Has always been. She's always been on it
7 since she was born until right now today, she still
8 is, medical and dental.

9 Q. So that wouldn't have been an out-of-pocket
10 expense that you incurred, that's something the Navy
11 would incur. Is that right?

12 A. What do you mean. No. That's --

13 Q. Do you pay the Navy for that coverage?

14 A. Yeah, I pay that. And my question real
15 quick is, I love these questions, but what does this
16 have to do with anything? Like are you her attorney
17 for the case with her?

18 Q. So when was the action brought to inform
19 Brazil or Indiana somewhere to modify the child
20 support payments?

21 A. I'm not for sure. You need to talk to my
22 lawyer about that because I knew I was paying, I knew
23 I was doing everything according to my divorce decree,
24 never missed anything or part of it versus paying
25 this, doing that, never one time went anywhere outside

1 of that. So guess what, why am I going to be worried?
2 If you get more money, that's what I'll give you; if
3 you get less money, that's what I'll give you. I've
4 always abided by the rules so I didn't care what it
5 was.

6 Q. Was there -- do you know if there was any
7 conversation or incident that prompted Ms. Pritchard
8 to bring an action to try to increase the amount of
9 child support?

10 A. There was. It was great. I believe -- oh,
11 yeah, my lawyer told me this.

12 MR. SPENGLER: Yeah.

13 THE WITNESS: What?

14 MR. SPENGLER: Well, conversations between
15 you and your lawyer are privileged.

16 THE WITNESS: Oh.

17 MR. SPENGLER: If you want to disclose them,
18 you can.

19 Q. It's your right. I can't -- I have a
20 duty --

21 A. Oh, okay. Sorry about that. See, I
22 don't -- all these ins and outs of all this stuff --

23 Q. You can waive the privilege and tell me, but
24 I don't want you to think you have to.

25 A. Basically what happened, she dropped

1 paperwork on me when she saw me on TV with Jesse
2 Itzler.

3 Q. Okay.

4 A. She saw -- she saw that and then dropped
5 paperwork on me assuming that I made more money.

6 Q. Had you, in the preceding years, informed
7 Ms. Pritchard of the amount of money that you were
8 making in connection with your speaking engagements?

9 A. No. We weren't talking.

10 Q. Did you, at any point, inform her about your
11 agreement with Jesse Itzler to receive half the
12 royalties?

13 A. I don't know why I would discuss that with
14 her. That's my personal life, what I'm doing.

15 Q. You didn't think that what you were making
16 in terms of income was something that she needed to
17 know for purposes of child support?

18 A. I thought that -- well, I didn't think. I
19 know if I'm doing what I'm ordered to do -- only time
20 there's concern with something is if you're not doing
21 what the law tells you to do. So I've always done
22 what the law told me to do so no, there was no
23 concern.

24 Q. Did you ever tell anybody in the Navy that
25 Jade was the child of an Air Force grunt?

1 Q. Has anybody discussed with you or mentioned
2 to you any of the allegations in the lawsuit?

3 A. I don't believe so.

4 Q. Okay. All right.

5 MR. MEEK: I believe those are all the
6 questions. I have appreciate your time today.

7 THE WITNESS: No. You guys are awesome.
8 You are amazing.

9 MR. SPENGLER: I just have a small handful
10 of questions just to get something on the record here.

11 EXAMINATION

12 BY MR. SPENGLER:

13 Q. Mr. Goggins, when did you start living with
14 your mother?

15 A. When I retired, November of 2015.

16 Q. November of 2015?

17 A. Uh-huh, around there.

18 Q. And where did you say you lived earlier in
19 2015?

20 A. I lived in Illinois, Libertyville.

21 Q. Okay. Did you and Mr. Castro ever discuss
22 compensation for what was to become a film?

23 A. No, never.

24 Q. What was your understanding of the
25 compensation that each of you would earn if the film

1 was to be produced?

2 A. I don't have any answer for that, like there
3 was no talk about compensation at all.

4 Q. Did Mr. Castro ever ask you what you would
5 accept in compensation if the film was to be produced?

6 A. No. Like I said, there was no talk about
7 compensation.

8 Q. Did he ever offer you any percent of the
9 revenue profit, any other form of compensation?

10 A. No.

11 Q. What would you have received in compensation
12 had the film been produced?

13 MR. MEEK: Objection. Form.

14 A. I have no idea because none of this was
15 talked about.

16 Q. And earlier I believe you testified that you
17 have no knowledge of industry norm or standards in
18 terms of compensation for films and various roles in
19 the production of films. Is that correct?

20 A. That's correct. As a matter of fact, what
21 you just said makes no sense to me. I have no idea
22 what you're talking about.

23 Q. Let me restate the question. You have no
24 industry knowledge about how much anybody gets paid in
25 the production of a film?

1 **A. No.**

2 MR. MEEK: Objection to form.

3 **A. I have no idea what anybody gets paid.**

4 Q. Would you have agreed to accept no money in
5 compensation to produce the screenplay that Mr. Castro
6 last presented to you in 2015?

7 MR. MEEK: Objection. Form.

8 **A. Never in a million years would I ever just**
9 **give somebody what I went through in my life for free.**

10 Q. And did you ever communicate anything to the
11 contrary to Mr. Castro?

12 **A. No, never have.**

13 MR. SPENGLER: No further questions. Do you
14 want to redirect?

15 MR. MEEK: We're done.

16 MR. SPENGLER: Okay.

17 (The deposition concluded at 2:40 p.m.)

18 (Signature was reserved.)
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